

**FINDING OF NO SIGNIFICANT IMPACT
AND
DECISION RECORD**

UT-040-04-054

**Southern Utah Support Area Fire Management Plan
Environmental Assessment (EA)**

Based on the analysis of potential environmental impacts in the attached environmental assessment (EA UT-040-04-054) and consideration of the significance criteria in 40 CFR 1508.27, I have determined that the Southern Utah Support Area Fire Management Plan (FMP) would not result in significant impacts on the human environment. An environmental impact statement (EIS) is therefore not required.

Decision:

It is my decision to authorize the implementation of the Southern Utah Support Area Fire Management Plan as described in the Proposed Action alternative of EA-UT-040-04-054.

Summary of the Selected Alternative:

The selected alternative is the Proposed Action alternative of the EA. The fire and fuels management direction as currently documented in the Support Area's Fire Management Plan would be replaced by new direction outlined in the selected alternative. The decisions in this fire management plan provide criteria to guide implementation-level fire management actions.

The selected alternative emphasizes strategic fire management planning that integrates resource management goals, objectives, and concerns with fire management actions. Further, it emphasizes protection of life and resources through wildland fire and fuels management, and incorporates current scientific principles regarding the benefits of wildland fire in the ecosystem while implementing cost-effective fire management strategies. Management direction is organized within the FMP by 26 land area subdivisions called fire management units (FMUs). The selected alternative describes fire management actions, goals (by acres), and objectives for each FMU. The four fire management activities considered in the selected alternative are:

- Wildland fire suppression – suppression objectives outline the acreage-per-fire-event to which wildland fires will be contained within that FMU; emergency stabilization and rehabilitation (ESR) actions may follow wildland fire suppression
- Wildland fire use – accomplishing specific pre-determined resource management goals with the management of naturally ignited wildfires (for each FMU where wildland fire use has been identified for *potential* use)
- Prescribed fire fuel treatments – the use of prescribed fire would be used to benefit ecosystems and reduce hazardous fuels (after an interdisciplinary review of specific areas for suitability)
- Non-fire fuel treatments – the use of mechanical, chemical, biological, or seeding treatments to benefit ecosystems and reduce hazardous fuels (after an interdisciplinary review of specific areas for suitability)

To protect natural and cultural resources, the selected alternative identifies fire management Resource Protection Measures (see Attachment #1) for the implementation of wildland fire suppression, wildland fire use for resource benefit, prescribed fire and non-fire fuel treatments, and emergency stabilization and rehabilitation actions.

The U.S. Fish and Wildlife Service (FWS) has completed a Biological Opinion on the Proposed Action alternative and Terms and Conditions have been identified in Appendix K, "USFWS Biological Opinion's Terms and Conditions," of the EA. The Resource Protection Measures and FWS Terms and Conditions minimize or avoid resource impacts. Therefore, no additional mitigation is necessary because of the protections afforded by the selected alternative. Monitoring of the implementation and effectiveness of the FMP would be conducted through site-specific project planning.

Fire management actions will be evaluated for adherence to this FMP and the associated Resource Protection Measures. Specific monitoring requirements will be followed for prescribed fire (H-9214-1, 1998) and ESR (ESR Handbook, 1999). The extent of monitoring activities may be limited by lack of funding.

Rationale for the Decision:

The decision to authorize the implementation of the Southern Utah Support Area FMP has been made in consideration of the potential environmental impacts of the selected alternative. The selected alternative conforms with BLM planning directives and federal fire management policy, as described in the Federal Wildland Fire Management Policy (1995), Review and Update of the Federal Wildland Fire Management Policy (2001), and A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment: Ten-Year Comprehensive Strategy (2001). National fire management direction has evolved in recent years in response to increased fatalities, property loss, local economic disruptions, risk to ecosystems associated with increasingly severe wildland fire seasons, and increasing wildland urban interface conflicts. Federal agencies have been mandated to revise fire management programs to incorporate practices designed to increase protection of human life while decreasing the potential for natural/cultural resource and private property damage.

The selected alternative incorporates these policy changes into the Support Center's FMP and provides the necessary fire management tools to public land managers across the state to meet resource objectives. This implementation-level plan provides fire management direction that is compliant with national and interagency direction. The FMP documents the fire management program for the Southern Utah Support Area, which is comprised of BLM-administered lands in the St. George, Cedar City, and Kanab Field Offices, as well as the Grand Staircase-Escalante National Monument. The FMP is based on the Utah Land Use Plan Amendment for Fire and Fuels Management (2005), which amended the St. George (1999) and Cedar Beaver Garfield Antimony Resource Management Plans (1986), the Grand Staircase-Escalante National Monument Management Plan (1999), and the Pinyon (1983), Zion (1981), Paria (1981), Escalante (1981), and Vermilion (1981) Management Framework Plans. FMPs are the fire manager's primary guide for planning and implementing fire-related direction on the ground. FMPs incorporate the broader LUP management direction provided in the Amendment (2005).

The No Action alternative was not selected because it does not meet the purpose and need of the proposed action. The No Action alternative would not conform with national and agency direction for fire and fuels management planning. The No Action alternative would be

inconsistent with the land use plans, as amended, because it would continue the implementation of fire management decisions that do not reflect current fire management direction.

This decision takes into consideration the potential environmental impacts that could result from implementation of the FMP. Potential resource conflicts with fire and fuels management actions have been resolved with the incorporation of the Resource Protection Measures and FWS Terms and Conditions. These Resource Protection Measures and FWS Terms and Conditions will minimize or eliminate conflicts or potential impacts associated with the FMP.

This fire management planning process included several opportunities for public participation. A public scoping period was provided in the spring and summer of 2004 (April 2 to July 14, 2004) when the environmental assessment process was initiated, with five public scoping meetings. Comments received during the scoping period helped to finalize the Proposed Action and address resource conflicts. The public was notified of an opportunity to review and comment on the EA from January 16, to February 17, 2006. Two comment letters were received. The EA was slightly modified as a result of the comments and a listing of errata has been prepared. Comments received did not lead to changes in the analysis of the environmental impacts of the proposed amendment. Please see Attachment #2 for the BLM Response to Comments and Errata to the EA.

The BLM has complied with agency and CEQ guidelines for NEPA and public participation. Throughout the development of this EA, no inconsistencies with local, state, tribal, or other federal agency land use plans, policies, or programs were identified or brought to the attention of the BLM. Further, the selected alternative is in compliance with all federal and local laws. There are no known unresolved conflicts or issues with members of the public, organizations, or other agencies related to this FMP.

APPEALS LANGUAGE

The decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR Part 4. Public notification of this decision will be considered to have occurred on the date of signature by the Utah State Director, below. Within 30 days of the decision, a notice of appeal must be filed in the office of the authorized officer at the BLM Utah State Office, Attn: State Director, P.O. Box 45155, Salt Lake City, Utah 84145-0155. If a statement of reasons for the appeal is not included with the notice, it must be filed with the Interior Board of Land Appeals, Office of Hearings and Appeals, U.S. Department of the Interior, 801 North Quincy St., Suite 300, Arlington, VA 22203 within 30 days after the notice of appeal is filed with the authorized officer.

If you wish to file a petition for stay pursuant to 43 CFR Part 4.21(b), the petition for stay should accompany your notice of appeal and shall show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied,
- (2) The likelihood of the appellant's success on the merits,
- (3) The likelihood of irreparable harm to the appellant or resources if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

If a petition for stay is submitted with the notice of appeal, a copy of the notice of appeal and petition for stay must be served on each party named in the decision from which the appeal is taken, and with the IBLA at the same time it is filed with the authorized officer.

A copy of the notice of appeal, any statement of reasons and all pertinent documents must be served on each adverse party named in the decision from which the appeal is taken and the Office of the Regional Solicitor, U.S. Department of the Interior, 6201 Federal Building, 125 South State Street, Salt Lake City, Utah 84138-1180, not later than 15 days after filing the document with the authorized officer and/or IBLA.

/s/ Gene Terland

Acting State Director

May 4, 2006

Date of signature

Attachment #1:

Resource Protection Measures identified in the Southern Utah Support Area Fire Management Plan EA

Attachment #2:

BLM Response to Comments and Errata to the EA

**Attachment #1: Resource Protection Measures identified in the Southern Utah
Support Area Fire Management Plan EA (Appendix F of the EA, as corrected by
Attachment #2 - Errata)**

Note: All Resource Protection Measures are applicable to the Selected Alternative. Those applying to the No Action Alternative are identified as well (denoted by 'Y').

Code	Protection Measures (and applicable fire management practices)	Abbreviations for fire management actions: SUP: Wildfire suppression; NF: Non-fire fuels treatment; WFU: Wildland fire use for resource benefit; ESR: Emergency stabilization and rehabilitation; RX: Prescribed Fire.																										
		No Action Alternative	Big Deer	Blues	Collett/50 mi	Escalante/CC	Kaiparowits	Beaver	Escalante D	Hamblin V	Mineral-Black	Mtn Home	Parowan/Antelope	Pine Valley	Wah-Wah Needles	Wah Wah V	Colo Plateau	Great Basin	Kolob	Mohave D	Buckskin/Dog	East Sands	E Zion/No Flc	Glendale Bench	Kanab-Johnson	Panguitch	Paria	West Sands
	General Resource Protection																											
G-1	Fire rehabilitation and stabilization must begin immediately during suppression. (ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Air Quality																											
AQ-1	Evaluate weather conditions, including wind speed and atmospheric stability, to predict impacts from smoke from prescribed fires and wildland fire use. Coordinate with Utah Department of Environmental Quality for prescribed fires and wildland fire use. (RX, WFU)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
AQ-2	When using chemical fuels reduction methods, follow all label requirements for herbicide application. (NF)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
AQ-3	Monitor wind direction and smoke drift, take actions needed to minimize effects on Zion National Park. (NF)	Y																				X						
	Cultural Resources																											
CR-1	Cultural resource advisors must be contacted when fires occur in fire management units (FMUs) containing sensitive cultural resources. (SUP)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
CR-2	Wildland fire use is discouraged in areas containing sensitive cultural resources. A programmatic agreement is being prepared by Utah State Historic Preservation Office, BLM, and the Advisory Council to cover the finding of adverse effect to cultural resources associated with wildland fire use. (WFU) (LUP CR-2)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
CR-3	Potential impacts of proposed treatment must be evaluated for compliance with National Historic Preservation Act and Utah statewide protocol. This must be conducted prior to the proposed treatment. (RX, NF, ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
CR-4	No heavy equipment use until resource advisor or monument manager arrives. (SUP, WFU)	Y	X	X	X	X	X														X	X		X		X	X	X

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	Invasive, Non-Native Species																													
INV-1	Post-fire weed management would include all invasive plant species, not just noxious weeds, and must take a high priority. (ESR)		X	X	X	X	X	X																						X
INV-2	In areas known to have weed infestations, aggressive action must be taken to rehabilitate firelines, seed, and provide follow-up monitoring and treatment to reduce the spread of noxious weeds. Monitor burned areas and treat as necessary. All seed used would be tested for purity and for noxious weeds. Seed with noxious weeds would be rejected (BLM 1991). (SUP, WFU, RX, NF, ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
INV-3	All machinery and equipment must be high-pressure washed to remove loose soil before entering project/incident areas, where appropriate. (SUP, WFU, RX, NF, ESR)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Native American Religious Concerns																													
NAT-I	Consultations with tribes that claim affiliation to the Southern Utah Support Area (SUSA) planning area would be conducted prior to agency actions, including rehabilitation and hazard fuels reduction projects where traditional cultural properties, sacred sites, or traditional subsistence resources could be affected. (SUP, WFU, RX, NF, ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Threatened, Endangered, or Candidate Species (plants and animals)																													
END-I	Initiate Emergency Section 7 consultation with U.S. Fish and Wildlife Service (USFWS) upon the determination that wildfire suppression may pose a potential threat to any listed threatened and endangered species (TES) or adverse modification of designated critical habitat. (SUP, WFU)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

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		No Action Alternative	Big Deer	Blues	Collett/50 mi	Escalante/CC	Kaiparowits	Beaver	Escalante D	Hamblin V	Mineral-Black	Mtn Home	Parowan/Antelope	Pine Valley	Wah-Wah Needles	Wah Wah V	Colo Plateau	Great Basin	Kolob	Mohave D
END-2	Prior to planned fire management actions, survey for listed TES and non-listed sensitive species. Initiate Section 7 consultation with USFWS as necessary if proposed project may affect any listed species. Review appropriate management, conservation and recovery plans and include recovery plan direction into project proposals. For non-listed special status plant and animal species, follow the direction contained in the BLM Manual 6840. Ensure that any proposed project conserves non-listed sensitive species and their habitats and ensure that any action authorized, funded or carried out by BLM does not contribute to the need for any species to become listed. (RX, NF, ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
END-3	See site-specific conservation measures identified in the Biological Opinion (see Appendix K of the EA). (SUP, WFU, RX, NF, ESR)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
END-4	All fires within and adjacent to the sage grouse areas (and the lands between the mapped sage grouse habitat) must be immediately suppressed at less than five acres. Limit fires to a maximum of five acres per fire to preserve the sagebrush habitat component on the Skutumpah Terrace above the White Cliffs. (SUP)		X																	
END-5	To protect all special status species (BLM Sensitive), no mechanized equipment or hand tools are recommended for these populations and fire size must be limited to five acres. (SUP)		X	X	X	X	X	X	X	X	X	X	X	X	X				X	
END-6	All fires within Jones' Cycladenia and Plateau Ladies Tresses habitats must be immediately suppressed using low-impact/non-surface disturbing methods. (SUP)	Y			X															
END-7	Suppression action within sensitive plant or TE/sensitive animal areas would be as outlined in the multiple use restrictions for the species. (SUP)											X								
END-8	Fully suppress riparian wildfires, especially in the Spring Creek Wilderness Study Area (WSA), to prevent damage to Mexican spotted owl habitat. (SUP)	Y										X								

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		No Action Alternative	Bip Deer	Blues	Collett/50 mi	Escalante/CC	Kaiparowits	Beaver	Escalante D	Hamblin V	Mineral-Black	Mtn Home	Parowan/Antelope	Pine Valley	Wah-Wah Needles	Wah Wah V	Colo Plateau	Great Basin	Kolob	Mohave D	Buckskin/Dog	East Sands	E Zion/No Fk	Glendale Bench	Kanab-Johnson	Panguitch	Paria
END-9	The Woodbury Desert Study Area requires full suppression and must follow Desert Tortoise critical habitat protocol. (SUP)	Y																	X								
END-10	Fires suppression in Desert Tortoise critical habitat must follow protocol according to Fighting wildfire in desert tortoise habitat: consideration for land manage. (SUP)	Y															X		X								
END-11	To manage for sage grouse, a sensitive species, sage grouse guidelines would be followed in all fire suppression and habitat work. (SUP)	Y	X																						X		
END-12	To manage for Utah prairie dog, a sensitive species, BLM or Utah prairie dog guidelines must be followed in fire suppression. (SUP)	Y							X	X		X							X						X		
Wastes (hazardous or solid)																											
HW-1	Recognize hazardous wastes and move fire personnel to a safe distance from dumped chemicals, unexploded ordnance, drug labs, wire burn sites or any other hazardous wastes. Immediately notify BLM field office hazmat coordinator or state hazmat coordinator upon discovery of any hazardous materials, following the BLM hazardous materials contingency plan. (SUP, WFU, RX, NF, ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Water Quality (drinking/ground)																											
WQ-1	Suppress wildfires consistent with compliance strategies for restoring or maintaining the restoration of water quality-impaired (303d listed) waterbodies. Do not use retardant within 300 feet of water bodies. (SUP, WFU)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WQ-2	Plan and implement projects consistent with compliance strategies for restoring or maintaining the restoration of water quality impaired [303(d) listed] waterbodies. Planned activities must take into account the potential impacts on water quality, including increased water yields that can threaten fisheries and aquatic habitat, improvements at channel crossings, channel stability, and downstream values. Of special concern are small headwaters of moderate to steep watersheds, erosive or saline soils, multiple channel crossings, at-risk fisheries, and downstream residents. (RX, NF, ESR)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

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WQ-3	Prevent degradation of groundwater quality whenever practicable. (SUP, WFU, RX, NF, ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X					
WQ-4	When using chemical fuel reduction treatments, follow all label directions, additional mitigations identified in project NEPA evaluation, and the approved pesticide-use proposal for the chemical(s) being used. Provide a minimum 100-foot-wide riparian buffer strip for aerial application, 25 feet for vehicle application and 10 feet for hand application. Any deviations must be in accordance with the label. Herbicides would be applied to individual plants within 10 feet of water where application is critical (BLM 1991). (NF)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Wetlands/Riparian Zones																												
WET-1	Avoid heavy equipment in riparian or wetland areas. During fire suppression or wildland fire use, consult a resource advisor before using heavy equipment in riparian or wetland areas. (SUP, WFU, RX, NF, ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WET-2	Limit ignition within native riparian or wetland zones. Allow low-intensity fire to burn into riparian areas. (RX)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WET-3	No blading within 1/4-mile buffer of riparian zone. (SUP)																		X						X			
WET-4	Limit wildfires within riparian areas to 100 acres. (SUP, WFU)				X	X																				X		
WET-5	Limit wildfires within riparian areas to five acres. (SUP, WFU)					X																						
WET-6	Restrictions on use of foam and aerial retardant (requires non-toxic certification). If entire riparian habitat is in jeopardy, the resource advisor could allow all necessary suppression tactics to avoid the total loss of habitat, especially where native communities exist. (SUP)	Y														X	X	X	X									
WET-7	Fire suppression within 1/8 mile of riparian zone to prevent destruction of endangered species habitat, or fisheries habitat. (SUP)															X	X		X									

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WET-8	No blading within 1/8-mile buffer of riparian zone. (SUP)																X	X
Wilderness and Wilderness Study Areas (H-8550-1, H-1742-1, Manual Section 1742)																		
WILD-1	Use of earth-moving equipment must be authorized by the field office manager for wilderness-related designations and all other land areas. (SUP, WFU, RX, ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WILD-2	Fire management actions would rely on the most effective methods of suppression that are least damaging to wilderness values, other resources and the environment, while requiring the least expenditure of public funds. (SUP, WFU)	Y	X	X	X	X	X					X					X	X
WILD-3	A resource advisor must be consulted when fire occurs in wilderness and WSAs. (SUP, WFU)	Y	X	X	X	X	X					X					X	X
WILD-4	Use of fire retardant must be authorized by the field office manager for wilderness related designations and all other land areas. (SUP, WFU)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WILD-5	All surface disturbances caused by suppression actions would be rehabilitated to the fullest extent. (SUP, WFU)	Y	X	X	X	X	X					X					X	X
WILD-6	Suppression actions would be employed within 1/4 mile for protection of private land and established subdivisions due to heavy fuel loading for all land areas, regardless of designation. (SUP)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Rangeland Health Standards and Guidelines																		
R-1	Rangelands that have been burned by wildfire, prescribed fire, or wildland fire use would be ungrazed for a minimum of one complete growing season following the burn.(SUP, WFU, RX)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
R-2	Rangelands that have been re-seeded or otherwise treated to alter vegetative composition, chemically or mechanically, would be ungrazed for a minimum of two complete growing seasons. (RX, NF, ESR)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

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FW-2	Avoid or limit the size of, wildland fires in important wildlife habitats such as mule deer winter range, riparian, and occupied sage grouse habitat. Use resource advisors to help prioritize resources and develop wildland fire situation analyses and wildland fire implementation plans when important habitats may be impacted. (SUP, WFU)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
FW-3	Minimize wildfire size and frequency in sagebrush communities where sage grouse habitat objectives would not be met if a fire occurs. Prioritize wildfire suppression in sagebrush habitat with an understory of invasive, annual species. Retain unburned islands and patches of sagebrush unless there are compelling safety, private property and resource protection or control objectives at risk. Minimize burn-out operations (to minimize burned acres) in occupied sage-grouse habitats when there are no threats to human life and/or important resources. (SUP)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
FW-4	Establish fuels treatment projects at strategic locations to minimize size of wildfires and limit further loss of sagebrush. Fuels treatments may include green-stripping to help reduce the spread of wildfires into sagebrush communities. (RX, NF)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
FW-5	Use wildland fire to meet wildlife objectives. Evaluate impacts to sage grouse habitat in areas where WFU for resource benefit may be implemented. (WFU, RX)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
FW-6	Create small openings in continuous or dense sagebrush (>30% canopy cover) to create a mosaic of multiple-age classes and associated understory diversity across the landscape to benefit sagebrush-dependent species. (WFU, RX, NF)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
FW-7	Implement treatments (fire, cutting, chaining, seeding, etc.) on sites that are currently occupied by forests or woodlands but historically supported sagebrush communities to reestablish sagebrush communities. (RX, NF)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
FW-8	Evaluate and monitor burned areas and continue management restrictions until the recovering and/or seeded plant community reflect the desired condition. (SUP, WFU, RX, ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Code	Protection Measures (and applicable fire management practices)	Abbreviations for fire management actions: SUP: Wildfire suppression; NF: Non-fire fuels treatment; WFU: Wildland fire use for resource benefit; ESR: Emergency stabilization and rehabilitation; RX: Prescribed Fire.																												
		No Action	Alternative	Big Deer	Blues	Collett/50 mi	Escalante/CC	Kaiparowits	Beaver	Escalante D	Hamblin V	Mineral-Black	Mtn Home	Parowan/Antelope	Pine Valley	Wah-Wah Needles	Wah Wah V	Wah Plateau	Great Basin	Kolob	Mohave D	Buckskin/Doe	East Sands	E Zion/No Flk	Glendale Bench	Kanab-Johnson	Panguitch	Paria	West Sands	
FW-9	Utilize the ESR program to apply appropriate post-fire treatments within crucial wildlife habitats, including sage grouse habitats. Minimize seeding with non-native species that may create a continuous perennial grass cover and restrict establishment of native vegetation. Seed mixtures must be designed to re-establish important seasonal habitat components for sage grouse. Leks must not be re-seeded with plants that change the vegetation height previously found on the lek. Forbs must be stressed in early and late brood-rearing habitats. In situations of limited funds for ESR actions, prioritize rehabilitation of sage grouse habitats. (ESR)	Y		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Soils																														
S-1	Avoid heavy equipment use on highly erosive soils (soils with low soil loss tolerance), wet or boggy soils and slopes greater than 30%, unless otherwise analyzed and allowed under appropriate National Environmental Policy Act (NEPA) evaluation with implementation of additional erosion control and other soil protection mitigation measures. (SUP, WFU, RX, NF, ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
S-2	There may be situations where high intensity fire would occur on sensitive and erosive soil types during wildland fire, wildland fire use or prescribed fire. If significant areas of soil show evidence of high severity fire, then evaluate area for soil erosion potential and downstream values at risk and implement appropriate or necessary soil stabilization actions such as mulching or seeding to avoid excessive wind and water erosion. (SUP, WFU, RX)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
S-3	Complete necessary rehabilitation on firelines or other areas of direct soil disturbance, including but not limited to waterbarring firelines, covering and mulching firelines with slash, tilling and/or subsoiling compacted areas, scarification of vehicle tracks, off-highway vehicle (OHV) closures, seeding and/or mulching for erosion protection. (SUP, WFU, RX)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Code	Protection Measures (and applicable fire management practices)	No Action	Alternative	Big Deer	Blues	Collett/50 mi	Escalante/CC	Kaiparowits	Beaver	Escalante D	Hamblin V	Mineral-Black	Mtn Home	Parowan/Antelope	Pine Valley	Wah-Wah Needles	Wah Wah V	Colo Plateau	Great Basin	Kolob	Mohave D	Buckskin/Dove	East Sands	E Zion/No Flk	Glendale Bench	Kanab-Johnson	Panguitch	Paria	West Sands
	Abbreviations for fire management actions: SUP: Wildfire suppression; NF: Non-fire fuels treatment; WFU: Wildland fire use for resource benefit; ESR: Emergency stabilization and rehabilitation; RX: Prescribed Fire.																												
S-4	When using mechanical fuels reduction treatments, limit tractor and heavy equipment use to periods of low soil moisture to reduce the risk of soil compaction. If this is not practical, evaluate sites, post treatment and if necessary, implement appropriate remediation, such as subsoiling, as part of the operation. (NF)	Y		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
S-5	Treatments such as chaining, plowing, and roller chopping would be conducted as much as practical on the contour to reduce soil erosion (BLM 1991). (NF, ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Recreation																													
REC-1	Wildland fire suppression efforts would preferentially protect special recreation management areas and recreation site infrastructure in line with fire management goals and objectives. (SUP)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
REC-2	Vehicle tracks created off established routes would be obliterated after fire management actions in order to reduce unauthorized OHV travel. (SUP, WFU, RX, NF, ESR)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Geology/Mineral Resources, including Oil and Gas																													
M-1	A safety buffer must be maintained between fire management activities and at-risk facilities. (SUP, WFU, RX)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Paleontology																													
P-1	Plan and implement projects consistent with BLM Manual and Handbook H-8270-I, Chapter III (A) and III (B) in order to avoid areas where significant fossils are known or predicted to occur, or to provide for other mitigation of possible adverse effects. (RX, NF, ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
P-2	In the event that paleontological resources are discovered in the course of surface fire management activities, including fires suppression, efforts must be made to protect these resources. (SUP, WFU, RX, NF, ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Code	Protection Measures (and applicable fire management practices)		Abbreviations for fire management actions: SUP: Wildfire suppression; NF: Non-fire fuels treatment; WFU: Wildland fire use for resource benefit; ESR: Emergency stabilization and rehabilitation; RX: Prescribed Fire.																												
			No Action	Alternative	Big Deer	Blues	Collett/50 mi	Escalante/CC	Kaiparowits	Beaver	Escalante D	Hamblin V	Mineral-Black	Mtn Home	Parowan/Antelope	Pine Valley	Wah-Wah Needles	Wah Wah V	Wah-Wah Plateau	Great Basin	Kolob	Mohave D	Buckskin/Dog	East Sands	E Zion/No Flk	Glendale Bench	Kanab-Johnson	Panguitch	Paria	West Sands	
P-3	There are important and sensitive paleontological resources in this FMU. A resource advisor and paleontologist must be ordered for every wildfire report and all fires where on-ground actions occur. (ESR)			X																											
	Lands/Access																														
LA-1	Fire management practices would be designed to avoid or otherwise ensure the protection of authorized rights-of-way and other facilities located on the public lands, including coordination with holders of major right-of-way systems within right-of-way corridors and communication sites. (WFU, RX, NF, ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
LA-2	The actions of any fire management practice must not destroy, deface, change, or remove to another place any monument or witness tree of the Public Land Survey System. Cadastral surveys (see 18 USC Sec. 1858, Title 18, Part I, Chapter 91, Section 1858) (SUP, WFU, RX, NF, ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	To protect private structures and/or lands, fire suppression would consist of constructing a 0.5-mile buffer zone. (SUP, RX, NF)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X					X	X		X		X		X		X
LA-3	To protect private structures and/or lands, fire suppression would consist of constructing a 0.5-mile buffer zone. (SUP, RX, NF)																				X			X							
LA-4	To protect private structures and/or lands, fire suppression would consist of constructing 0.25-mile buffer zone around private structures. (SUP, RX, NF)																			X	X					X		X			
LA-5	To protect private structures and/or lands, fire suppression would consist of constructing 0.125-mile buffer zone around private structures. (SUP, RX, NF)																	X													
	Wild Horse and Burros																														
WHB -1	Rehabilitation plans would not propose the construction of range fencing that could restrict wild horses and burros access to water sources. (ESR)	Y	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Attachment #2: BLM Response to Comments and Errata to the EA

Response to Comments:

Commenter & comment number	Comment	Response
Mark Belles MB-1	<p>Appendix D fails to mention FMUs #25 or #26 identified in Figure 2.1.</p> <p>I concur with the designation of FMU #25 noted in Figure 2-1 as "Suppression Emphasis Category," due to the proximity of the town of Big Water, but object to the designation of FMU #26 as "Suppression Emphasis Category." FMU #26 is not significantly fragmented by private inholdings to justify categorization as "Suppression Emphasis Category" and unless specific resource concerns are identified, should be classified as a "Natural Fire Response Category" with appropriate acreage designated for wildland fire use.</p>	<p>It appears that the commenter is actually referring to Appendix E of the EA. FMUs #25 and #26 were erroneously left out of Appendix E. This information is included in the table below.</p> <p>Wildland fire use is not designated for FMU #26 because the following resources and values may be negatively impacted and there are no reasonable Resource Protection Measures to protect such resources and values:</p> <ul style="list-style-type: none">• Areas of soil with high or very high erosion hazard• Sensitive cultural resources• WUI areas• Communication sites <p>This information originates from the Southern Utah Support Area Draft FMP, from which this EA's proposed action was derived.</p>
MB-2	<p>#4 Escalante-Circle Cliffs, #5 Kaiparowits, #8 Hamblin Valley, #9 Mineral-Black Mountain, #17 Kolob and #19 Buckskin/Dog Valley. These FMUs are identified in figure 2-1 as "Natural Fire Response Category" areas and all have zero acres identified under the Appendix D column heading "Wildland Fire Use (10-year acreage estimates)." All of these areas are correctly identified as candidates for wildland fire use. Please include the 10-year estimates for public review and comment.</p>	<p>It appears that the commenter is actually referring to Appendix E of the EA. This appendix refers to 10-year average acreage estimates for fire management actions.</p> <p>Wildland fire use is appropriate only for some FMUs in the "Natural Fire Response Category" as stated in Chapter 2. "Natural Fire Response Category" actions include less aggressive suppression for wildfires (but not implementing wildland fire use), and use of prescribed fire for restoring natural processes.</p> <p>As stated in Chapter 2 (p. 2-5), the only FMUs where wildland fire use is available are: Kolob, Mountain Home, and Wah Wah Needles. The commenter notes that zero</p>

		<p>acres were identified for Kolob; Appendix E actually identifies 500 acres of wildland fire use for the Kolob FMU.</p> <p>Wildland fire use acre projections are highly dependent on many factors including budget, changing management goals and objectives, and desired wildland fire conditions, actual conditions of the a candidate fire considered for wildland fire use, and personnel constraints.</p>
MB-3	<p>#1 Big Deer, #3 Collett/Fifty mile mountain, #14 Wah Wah Valley, #16 Great Basin, #22 Glendale Bench, #24 Panguitch.</p> <p>These FMUs are identified in Appendix D under the column heading “Other Goals and Objectives” as appropriate for either wildland fire use or “natural fire” use as actions under the fire management plan and none of these areas identify any acreage under the “Wildland Fire Use (10-year acreage estimates)” column heading. All of these areas correctly identify wildland fire or natural fire use for management options.</p> <p>Please include the 10-year estimates for public review and comment.</p>	<p>It appears that the commenter is actually referring to Appendix E of the EA. This appendix refers to 10-year average acreage estimates for fire management actions.</p> <p>None of the 6 FMUs mentioned contain references to “wildland fire use” in Appendix E. These FMUs would not be appropriate for wildland fire use based on a variety of reasons. However, other types of natural fire (less aggressive suppression response to wildfires, or prescribed fires) may be used in these FMUs as stated in Appendix E and in Chapter 2.</p> <p>There are no 10-year estimates for wildland fire use for these FMUs since wildland fire use would not be appropriate.</p>
MB-4	<p>#12 Pine Valley and #18 Mohave Desert have no acreage identified in Appendix D as appropriate for wildland fire use under the FMP. Rationale presented in the “Other Goals and Objectives” column for such stringent limitations is either non-existent (#12) or insufficiently vague (#18).</p> <p>In the case of FMU #12, the “Other Goals and Objectives” column states what the</p>	<p>Wildland fire use is not designated for FMUs #12 and 18 because resources and values may be negatively impacted and there are no reasonable Resource Protection Measures in place. Resources and values include:</p> <ul style="list-style-type: none"> • Important terrestrial and aquatic habitats, including those of the Virgin River chub and desert tortoise. • Private lands including structures • Areas that are known to be highly susceptible to post-fire cheatgrass or invasive weed invasion

	<p>objectives are, but not why they are desired.</p> <p>In the case of FMU #18, it seems unlikely that wildland fire use must be restricted on all 216,682 acres to protect private property. The BLM land is just not that fragmented by public inholdings.</p> <p>Based on the Purpose and Needs statement's bias towards enhancing wildland fire use, either the acreage subject to wildland fire use should be increased or sufficient justification for not doing so should be presented for public review and comment.</p>	<p>This information originates from the Southern Utah Support Area Draft FMP, from which this EA's proposed action was derived.</p>
MB-5	<p>The Wah Wah Needles FMU (#13) is appropriately identified as a "Natural Fire Use (10-year acreage estimates)" column heading. My concern is that too small a percentage of the acres to be treated over a 10-year period is allotted to wildland fire use. With only 2.5% set aside for this purpose, 550,689 acres under BLM management will have to rely on prescribed fire for compliance with the FMP.</p> <p>I do not believe, based on historical data, that this will be achievable. A higher % of wildland fire use is recommended for this portion of the plan to be achievable.</p>	<p>The FMP does not state that all BLM acreage within the Wah Wah Needles FMU will be treated during the life of the plan. Further, such wide-scale treatment is not the goal or objective for the FMU.</p> <p>Goals and objectives for this FMU include conversion of pinyon and juniper woodlands to sagebrush/perennial grass using wildfire, prescribed fire and fuels treatments; conversion of pinyon to pinyon/mountain brush/perennial grass using wildfire, prescribed fire and fuels treatments; and treatment of sagebrush to improve grass component and improve age class diversity using mechanical and prescribed treatments.</p> <p>The 10-year estimates for acres treated were developed with the vegetation goals and objectives in mind.</p> <p>WFU acres are relatively low due to values at risk (e.g. recreation, important habitats, private lands, communication ties) or the likelihood of a fire exceeding the agency's capability for stabilization treatments.</p>

MB-6	<p>In reviewing the overall plan I am disappointed with the limited application of fuels/fire treatments in general and wildland fire use in particular under the proposed alternative.</p> <p>Using the data from Appendix D, there are approximately 4,956,000 acres in the planning area. Only 377,500 acres are identified under the “Decade Suppression Fire Goal”. This will result in only 7.6% of the planning area receiving some form of fuels/fire treatment over a 10-year period. At that rate it will take approximately 130 years for the entire planning area to be treated. This is far too long a frequency to be considered successful in satisfying the Purpose and Need of the project.</p> <p>Furthermore, only 63,000 acres are identified as appropriate wildland fire use over a 10-year period. This represents only 1.3% of the planning area. After all this work, the results of this plan affect only 1.3%. Again, is far too small a proportion of the area to be considered successful in satisfying the Purpose and Need of the project.</p>	<p>The FMP does not state that all BLM acreage within the planning area will be treated during the life of the plan. Such wide-scale treatment of these lands is not the intent of the BLM.</p> <p>The purpose and need state that “the revised FMP would further the ultimate goals of improving firefighter and public safety, reducing fuel loads, and maintaining the ecological functions of landscapes within the planning area.”</p> <p>The underlying objectives identified in the need for the selected alternative includes the need for the BLM to use a wide range of fire management actions to achieve ecosystem sustainability and wildland fire use is among those actions to be utilized. The extent to which each individual type of fire management action is utilized is, as has been stated, dependent on the resources and values at risk.</p> <p>The EA considered an alternative that mimicked acres burned historically considering the restoration of the natural fire regime. This alternative considered larger acres than the Proposed Action and only fire treatments were considered. This alternative was eliminated because it would not be ecologically or fiscally feasible (see 2.4.1).</p>
B. Sachau BS-1	<p>Erosion - there is no question that the erosion when trees and vegetation stop holding the soil because they are burned out of existence. The streams are adversely affected with the resultant erosion.</p>	<p>See Ch. 4.2.16 (Soil) and 4.2.8 (Water Quality) of the Environmental Assessment (EA) for analysis of erosion impacts.</p>
BS-2	<p>Birds and wildlife, including endangered species, are injured and die. They cannot escape these fires and some are injured and some die. Since the lands</p>	<p>See Ch. 4.2.15 (Fish and Wildlife) of the EA for discussion of impacts on wildlife, including birds. The U.S. Fish and Wildlife Service, per compliance with Section 7 of the Endangered Species Act, has completed</p>

	should be held for their protection, this burning is atrocious and horrible.	a Biological Opinion on the selected alternative (Sept. 2005). The Biological Opinion identifies measures that reduce impacts to threatened and endangered species. A summary of these measures is presented in Appendix K of the EA.
BS-3	Dropping chemicals to control the fire means that toxic chemicals are dropped onto the land, certainly not helpful to environmental health.	See Ch. 4.2.8 (Water Quality) of the EA for discussion of water quality impacts. Aerial application of fire retardant is considered in Resource Protection Measure WQ-I, Appendix F. All FMP actions would follow BLM standard operating procedures regarding aerial application of fire retardant.
BS-4	Burning can sterilize the soil so that nothing at all grows in the future and for a very long time. A burn can represent up to ten years without vegetation - creating a heat island in this time of global warming.	See Ch. 4.2.16 (Soil) and 4.2.14 (Vegetation) for discussion of soil and vegetation impacts.
BS-5	Air pollution -prescribed burning releases fine particulate matter which can and does travel thousands of miles, particularly eastward negatively impacting a great portion of the United States. Such fine particulate matter, which cannot be seen with the naked eye as "smoke" causes lung cancer, pneumonia, heart attacks, strokes, allergies and asthma, among other negative human health effects. Such injury and death to fellow Americans is beyond the pale.	See Ch. 4.2.1 (Air Quality) for discussion of impacts to air quality as stated in the EA. BLM will comply with all federal and state air pollution laws and regulations and will coordinate with the Utah Department of Environmental Quality, Division of Air Quality when implementing fire management actions.
BS-6	Out of control fires are far too frequent. The U.S. has been plagued with them in Oklahoma and Texas this year. New Mexico had an out of control fire last year. We had one on the Delaware River in New Jersey not too long ago. These out of control fires which result from planned burning are extremely expensive and cost the taxpayers	The BLM notes the comment.

	millions of dollars. There are many other good reasons NOT to allow this prescribed burning of land. Please consider this my opposition to your plans.	
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Errata to the EA:

The Fire Management Units #25-Paria and #26-West Sands were inadvertently omitted from Appendix E of the Environmental Assessment during final preparation of the document. The following description of the goals and objectives of these two Fire Management Units are appended to the table that comprises Appendix E.

These two FMUs were, however, considered and referred to in the Environmental Assessment (see Table 2.1, for instance) and therefore, no analysis was affected by this inadvertent omission.

Fire Management Unit (FMU)	Total FMU Acres	Total BLM Acres in FMU	Wildland Fire Suppression (contain fire per ignition at this acreage or less)	Decadal Suppression Fire Goal	Wildland Fire Use (10-year acreage estimates)	Prescribed Fire (10-year acreage estimates)	Non-Fire Fuel Treatments (10-year acreage estimates)	Other Goals and Objectives
#25 Paria	42,153	40,791	0	0	0	0	0	Use full suppression; no prescribed or fire use.
#26 West Sands	169,856	140,322	0	200	0	3,000	3,000	Use full suppression to protect unique habitats, municipal watersheds, cultural and historic sites, and private property. Improve the vigor of the ponderosa pine trees by reducing competition by pinyon and juniper woodland in the understory. Improve critical deer winter range.

Resource Protection Measure END-3 should state that site-specific conservation measures are identified in the USFWS Biological Opinion (see Appendix K of the EA), rather than the Biological Assessment. Appendix F, “Resource Protection Measures for Fire Management Units,” therefore, is modified as shown below.

[illegible]

Appendix F has been modified to show that the resource protection measures END-11 and CR-4 will also be applicable to the Big Deer FMU and the Kaiparowits FMU, respectively.

Code	Resource Protection Measures (and applicable fire management practices)																
		No Action	Big Deer	Blues	Collett/50 mi	Escalante/CC	Kaiparowits	Beaver	Escalante D	Hamblin V	Mineral-Black	Mtn Home	Parowan/Antelton	Pine Valley	Wah-Wah	Wah Wah V	West Sands
END-11	To manage for sage grouse, a sensitive species, sage grouse guidelines would be followed in all fire suppression and habitat work. (SUP)	Y	X														
Code	Resource Protection Measures (and applicable fire management practices)																
		No Action	Big Deer	Blues	Collett/50 mi	Escalante/CC	Kaiparowits	Beaver	Escalante D	Hamblin V	Mineral-Black	Mtn Home	Parowan/Antelton	Pine Valley	Wah-Wah	Wah Wah V	West Sands
CR-4	No heavy equipment use until resource advisor or monument manager arrives. (SUP, WFU)	Y	X	X	X	X	X										

Appendix H footnote c on page H-2 is replaced with the following:

“^C When a species and/or its habitat occurs in a county with BLM-administered lands, all field offices with public lands within that county have been included in this appendix. However, it should be noted that the species and/or its habitat may not actually occur within each listed field office.”

Appendix I is modified to include a footnote indicator for the table heading “Field Office^C”. On page I-5, therefore, the following statement is added below footnote b:

“^C When a species and/or its habitat occurs in a county with BLM-administered lands, all field offices with public lands within that county have been included in this appendix. However, it should be noted that the species and/or its habitat may not actually occur within each listed field office.”